

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

|                                      |   |                              |
|--------------------------------------|---|------------------------------|
| In re:                               | ) |                              |
|                                      | ) | Chapter 11                   |
| RS FIT NW LLC,                       | ) |                              |
|                                      | ) | Case No. 20-11568 (KBO)      |
| Debtor.                              | ) | (Jointly Administered)       |
| _____                                | ) |                              |
|                                      | ) |                              |
| 24 HOUR FITNESS WORLDWIDE, INC.,     | ) |                              |
|                                      | ) |                              |
| Plaintiff,                           | ) |                              |
|                                      | ) |                              |
| v.                                   | ) |                              |
|                                      | ) |                              |
| CONTINENTAL CASUALTY COMPANY;        | ) | Adv. Pro. No. 20-51051 (KBO) |
| ENDURANCE AMERICAN SPECIALTY         | ) |                              |
| INSURANCE COMPANY; STARR SURPLUS     | ) |                              |
| LINES INSURANCE COMPANY; ALLIANZ     | ) |                              |
| GLOBAL RISKS US INSURANCE COMPANY;   | ) |                              |
| LIBERTY MUTUAL INSURANCE COMPANY;    | ) |                              |
| BEAZLEY-LLOYD'S SYNDICATES 2623/623; | ) |                              |
| ALLIED WORLD NATIONAL ASSURANCE      | ) |                              |
| COMPANY; QBE SPECIALTY INSURANCE     | ) |                              |
| COMPANY; and GENERAL SECURITY        | ) |                              |
| INDEMNITY COMPANY OF ARIZONA,        | ) |                              |
|                                      | ) |                              |
| Defendants.                          | ) |                              |
| _____                                | ) |                              |

**PROPERTY INSURER DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND  
INCORPORATED MEMORANDUM OF LAW**

**EXHIBIT A-20**

*Email from Matt Piro to Jay Garcia, Matt Adame, Chris Schmidt, Beth Smits,  
Nicole Rodriguez, Melanie Radovich  
RE: 24 Hour Fitness Closures I KBS Notification  
(Deposition of Dan Larson – 30(b)(6), Exhibit 8) 24HF\_Production\_0195724*

## Message

**Sent:** 3/16/2020 10:50:23 PM  
**To:** Jay Garcia [JGarcia@kbs-services.com]; Matt Adame [MAdame@kbs-services.com]  
**CC:** Chris Schmidt [cschmidt@24hourfit.com]; Beth Smits [bsmits@24hourfit.com]; Nicole Rodriguez [nrodriguez@24hourfit.com]; Melanie Radovich [mradovich@24hourfit.com]  
**Subject:** 24 Hour Fitness Closures I KBS Notification  
**Importance:** High

KBS Team,

Please be advised that due to all of the gym closures required by the government related to the COVID-19 virus outbreak, all of our clubs will close tonight at midnight until further notice. We may solicit help from you with some cleaning during the closure, but all regular cleaning will end effective tonight at midnight until we are allowed to re-open – and we will reach out to you about any specific cleaning requests.

Please confirm receipt, and let me know if you have any questions.

We will communicate this to our member population later today or tomorrow.

These are unprecedented times that we are all working through and I wish you all the best. Thank you for your partnership!

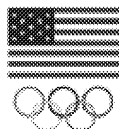
Stay safe!

Sincerely,  
 Matt

**Matt Piro**

Director, Club Operations  
 24 Hour Fitness USA, Inc.

Individualization | Achiever | Responsibility | Learner | Analytical



Proud Sponsor of the U.S. Olympic & Paralympic Teams

**EXHIBIT**

008

Dan Larson

04.28.22